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*Attorneys for Defendants  
Cahill Gordon & Reindel LLP  
(f/k/a Cahill Gordon & Reindel),  
Ira J. Dembrow, and Howard G. Sloane*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

KIMBERLEE WILLIAMS, ET AL.,

Plaintiffs,

v.

BASF CATALYSTS LLC, ET AL.,

Defendants.

CIV. ACTION NO. 11-1754 (JLL) (JAD)

**NOTICE OF CAHILL'S  
MOTION TO DISMISS  
PLAINTIFFS' SECOND AMENDED  
CLASS ACTION COMPLAINT**

ORAL ARGUMENT REQUESTED

**PLEASE TAKE NOTICE** that, as soon as counsel can be heard, the undersigned counsel for defendants Cahill Gordon & Reindel LLP (f/k/a Cahill Gordon & Reindel), Ira J. Dembrow, and Howard G. Sloane (collectively "Cahill"), shall move before the Honorable Jose L. Linares, U.S.D.J., at the United States District Court, District of New Jersey, for an Order dismissing Plaintiffs' Second

Amended Class Action Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that Cahill submits herewith a Brief in Support of the Motion to Dismiss, a Certification of Robert E. Ryan in Support thereof, and a proposed Form of Order. Cahill respectfully requests oral argument on the Motion.

CONNELL FOLEY LLP  
Attorneys for Defendants  
Cahill Gordon & Reindel LLP  
(f/k/a Cahill Gordon & Reindel),  
Ira J. Dembrow and Howard G. Sloane

Dated: September 25, 2015

*s/Robert E. Ryan*

Robert E. Ryan